1   if I in any way infringed upon Ameritech's confidentiality

2   rights.

3   MR. ANDERSON: I just don't know right

4   now, but I'll check.

5   MS. SCHNEIDEWIND: Do you consider it

6   problematic that the reports that Ameritech is willing to

7   make on whatever performance standards are made under

8   seal, are confidential?

9   MS. MARSH: Yes. For purposes of

10   assessment you need that data to assess parity, and I

11   don't know how that could be done.

12   It is our position that the data that we

13   would need to assess parity not only relates to AT&T's

14   performance but performance for CLECs as a whole and

15   Ameritech's retail performance and ACI's, performance

16   being provided to ACI, and I do think that is a problem

17   because there's no opportunity for a meaningful comparison

18   of each CLEC's performance to ensure that everybody is

19   getting treated equally, and that's what the parity

20   standard is all about: substantially the same manner and

21   substantially the same time from the FCC order.

22   Referring you back, then, to the

23   Competitive Market Performance Metrics -- and again I will

24   not take you through each one of these, that would be too

25   time-consuming -- but you will see as it relates to the

1   ordering and provisioning, which is the area that I was

2   just referencing, what the competitive local users want

3   and need is data on average intervals, not on provisioning

4   within an interval identified by Ameritech, in this case

5   six days, but give us your average interval. This is data

6   they have, this is data that they use for themselves, and

7   this is data they can share. It's only if we get through

8   average intervals that we can do a real comparison as to

9   how long it's taking you to process our orders as opposed

10   to how long it's taking you to process your own.

11   We also look for various other earmarks of

12   parity including information on order accuracy and order

13   status, our ability to get our orders processed the way

14   we've asked them to be processed, and our ability to

15   determine what the status of the order is while it's

16   pending.

17   Again for maintenance and repair we've

18   asked for mean time to restore, not the number that were

19   restored within 24 hours, because again if they're

20   restoring their retail service customers within two hours

21   and we're seeing an experience of an average of 20 hours,

22   that's not parity. But if you only look at the service

23   restored within 24 hours, it would look like parity in a

24   report. Mean time to restore, again data that Ameritech

25   has and data that should be shared and can be shared to

1   assess parity.

2   Our recommendation on this issue would be

3   that the Commission review the metrics that we've

4   identified in CLEC Exhibit No. 37 and recommend to the FCC

5   that it require Ameritech and other POTS to share this

6   type of information with CLECs before it can be concluded

7   that they have complied with the parity obligations of the

8   Telecommunications Act.

9   There are many other issues that we would

10   like to be able to address, but our time has expired, and

11   again I don't want to infringe, so we will pass the floor

12   to Ms. Campion, who will provide you with comments on

13   MCI's experience.

14   JUDGE MACE: Let me just indicate a

15   welcome to Commissioner Shea, and we now have Ms. Joan

16   Campion for MCI; is that right?

17   MS. JOAN CAMPION: Yes, that's correct.

18   Thank you very much, and good morning, and thank you for

19   the opportunity to make a presentation.

20   Just by way of introduction, I am the

21   Regional Director for Public Policy for Ameritech in the

22   Ameritech region. I am just going to be providing very

23   brief comments just to put what we're talking about today

24   into perspective with regard to the various market entry

25   strategies that companies like MCI intend to employ here

1   in Michigan. I will then turn over our presentation to

2   those who are really on the ground dealing with

3   Ameritech's OSS on a day-to-day basis to provide you with

4   our experience to date.

5   First I just want to spend just a very few

6   moments talking about MCI's market entry strategy, and

7   this would be true for Michigan, this would be true for

8   really any other state. We want to enter the local market

9   essentially via three arrangements, one being resale, one

10 being UNEs, which are unbundled network elements, and the

11 other entry strategy would be through facilities, and that

12 last category, facilities, would not be exclusively MCI's

13 facilities but could be a combination of MCI's facilities

14 and unbundled elements of Ameritech.

15   The importance of talking about these

16 entry strategies is to tell you that the OSS systems that

17 Ameritech has put in place must support all of the entry

18 strategies. We're hearing a lot today about resale. Yes,

19 resale is very important, but under the Act and the FCC

20 order, CLECs have an opportunity -- have the right and the

21 opportunity to enter the market via unbundled network

22 elements, and we need OSS systems to support that form of

23 entry as well, and we are very, very far from having those

24 OSS systems tested and actually used in the marketplace

25 today.

1   The next slide really just shows the three

2   levels of interconnection again, and I just want to make

3   just a couple of comments on this, and you can see where

4   resale has its advantages, that being speed of entry and

5   ubiquity of reach. But really in terms of what customers

6   want and need, it's less interesting. It gets us into the

7   market quickly but it doesn't allow for innovation that

8   companies like MCI and others can bring to the

9   marketplace. So while resale is oftentimes, particularly

10 for a company like AT&T, going to be the first form of

11 entry, really we want to be looking for use of unbundled

12 network elements and facilities because that's where we

13 can bring our innovation to the marketplace and really

14 differentiate ourselves from Ameritech, because as long as

15 we're doing resale, we're mimicking their services. And

16 again, we need the OSS systems to really support all forms

17 of entry.

18   I'll just back up a minute just to talk

19 about what MCI has done to date in Michigan, and I'll talk

20 a little bit more about this in a minute, but AT&T has

21 entered Michigan via resale initially while MCI has

22 actually entered Michigan via a facilities base, and we've

23 been in Michigan for quite a few months serving over our

24 own facilities. We are going to supplement that with

25 resale very soon as well as use of unbundled network

1   elements. To the extent that we've been serving over our

2   own facilities, we've not needed OSS from Ameritech

3   because it's our facilities. We will need the OSS systems

4   once we enter via resale and once we enter via unbundled

5   elements.

6   The importance of OSS, you've heard a lot

7   about that. I'm not going to restate that here other than

8   to note that the key to processing large volumes of

9   orders, it must be done in an efficient and reliable

10 manner. It must be fully automated and it must conform to

11 industry standards, and we believe in order for a finding

12 to be made that Ameritech has satisfied its obligations

13 under the Act with regard to OSS, that it must be

14 demonstrated to be in actual commercial use, and I think

15 later today we will show an exhibit from Ameritech's own

16 filing with the FCC that shows that the vast majority of

17 its OSS systems -- and you're talking resale and unbundled

18 network elements -- are not in actual commercial use in

19 the marketplace today.

20 Now, MCI's resale experience. We are

21 sending orders to Ameritech over EDI, we are using the

22 ordering interface. We are not using that interface for

23 Michigan customers today. Our experience to date is with

24 Illinois because that is the first market in the Ameritech

25 region that we entered via resale.

1   Now, one of the questions that the

2   Commission has attached to its hearing notice is, is the

3   experience in other states relevant to this Commission's

4   evaluation of OSS for Ameritech, and the answer to that is

5   absolutely yes. The orders that we are sending for our

6   Illinois customers are going from our service center in

7   Colorado to the service center in Milwaukee. There's

8   nothing unique about the orders that we are sending via

9   EDI for Illinois customers. Those orders are going to be

10   treated the same by Ameritech for the most part as orders

11   coming from Michigan or orders coming from Ohio. So I

12   think the experience that we can tell you about with

13   Ameritech's OSS for resale is highly relevant to your

14   assessment of whether or not those OSS standards or

15   systems that Ameritech is offering are satisfactory.

16   The experience we have to date -- and I'll

17   have a witness up here who will talk about that in more

18   detail -- are simple POTS orders. You've heard that

19   reference today: plain old telephone service, nothing

20   complex. Despite that, fully one-fourth of MCI's orders

21   are in limbo. Either we've not heard from Ameritech any

22   sort of confirmation that they've received the order, or

23   if we have heard about confirmation that they've received

24   the order, we've not received the complete notice. You've

25   already heard today from AT&T about the late 865s or the

1   pending orders. One-fourth of MCI's orders are in that

2   status.

3   You've heard already about the double-

4   billing problem. MCI has had customers who have been

5   impacted by the double-billing problem as well, customers

6   that we think are ours and in fact are continuing to

7   receive bills from Ameritech. Some of those customers

8   actually have an arrangement we are to direct debit to

9   their checking account. So in other words, not only are

10   they getting a bill, Ameritech is getting money.

11   Our experience shows unnecessary manual

12   intervention. We'll talk a little bit more about that in

13   detail.

14   And again, to bring it back to the fact

15   that we're sending simple POTS orders to Ameritech, once

16   we get into the more complex orders, the types of orders

17   that Susan Bryant talked about for AT&T, the type of

18   service to serve business customers -- Centrex, ISDN -- we

19   don't know how to order those electronically. If

20   Ameritech knows, they haven't shared it with us.

21   The lessons learned from resale. Again,

22   we've had problems with the simplest of orders. The only

23   ordering interface that is actually in use -- we've only

24   used the ordering interface and there have been many

25   problems, and probably the most valuable lesson, I think,

1   for purposes of this Commission's evaluation is that

2   internal testing does not equal operational readiness, and

3   I think that the difference between maybe what you had

4   heard in January and what you're hearing today is showing

5   that actual testing is showing that they're not

6   operationally ready.

7   CHAIRMAN STRAND: Before we get off

8   resale, that one-quarter number, do you have any type of

9   time breakdown on that?

10   MS. CAMPION: Yes, we do. As a matter of

11   fact, that's coming up in about one minute.

12   CHAIRMAN STRAND: O.K.

13   MS. CAMPION: But later on today we will

14   talk about the OSS for UNEs, unbundled network elements.

15   The conclusions we've reached from there -- we'll provide

16   more detail to you later -- are that most of the

17   interfaces and processes are not put to actual commercial

18   use, and what we do know about these interfaces and

19   processes reveal deficiencies, in our view.

20   I'm now going to turn over the

21   presentation for MCI to Ali Miller. Ali is our Market

22   Manager for Mass Markets for the Ameritech Region. Ali is

23   the employee of MCI who's really having the most firsthand

24   experience with Ameritech's OSS systems for resale.

25   MS. ALI MILLER: Good morning, or

MERRILL & ASSOCIATES, INC.

1   afternoon I guess we are. I will just be addressing the

2   resale experience we've had to date, and I think I would

3   like to cover four major issues that we've had with

4   Ameritech, one being that the OSS is unable to process

5   complex resale orders; that there is unnecessary manual

6   intervention that is causing delay to our orders that AT&T

7   has raised as well; and that we've had difficulty

8   obtaining information on interfaces and procedures through

9   what we started with Ameritech the beginning of August,

10   and there's very high-level documentation produced but

11   nothing that we could take and really build a system,

12   build processes. It was like we were flying blind with

13   this, and it wasn't until just very recently that complete

14   documentation had been provided to us.

15   And we also have operational problems that

16   have not been resolved, and I think AT&T did a very good

17   job in describing some of their issues that we have also

18   seen.

19   For resale we cannot order anything more

20   complicated than POTS. We do not know how to order ISDN,

21   private lines, Centrex, frame relay. There have been no

22   specifications given. The only specification, I think,

23   that we have is for Centrex and is just how to assume an

24   order as is. We cannot do a new Centrex order through an

25   EDI interface. We would have to take the order on our

1   system, fill out a manual form, fax that manual form, have

2   them respond to us manually and update our systems

3   manually.

4   COMMISSIONER SVANDA: Actually have you

5   tried to do that?

6   MS. MILLER: Send it through a fax?

7   COMMISSIONER SVANDA: Have you tried to

8   order Centrex systems?

9   MS. MILLER: No.

10   COMMISSIONER SVANDA: O.K. You can't

11 because you haven't wanted to?

12   MS. MILLER: We're still having troubles

13 getting simple POTS orders over, and we haven't gotten the

14 documentation to handle a Centrex order.

15   Just to give you some history on our

16 experiences with Ameritech, we began, as I said,

17 discussions back in August, and I'd have to say between

18 August and December -- really August through -- August

19 through December we were given some product guides, some

20 documentation here and there, some USOCs. Everything was

21 very incomplete, very high level. It was a matter of MCI

22 providing questions to Ameritech, Ameritech responding to

23 MCI with answers, and it was a very long, arduous process,

24 and I'd give an example where our first meeting to discuss

25 EDI and the specifications, we requested with Ameritech on

1 October 7th. Ameritech said they could not meet with us

2 until October 30th. On October 29th Ameritech canceled

3 the meeting on us and then could not reschedule until

4 November 20th, which is a month and a half after the

5 original request. And even in that meeting there was

6 additional follow-up questions that took weeks afterwards

7 to get resolved.

8   JUDGE MACE: Are you saying that you have

9 not received copies of these guidelines that Mr. Mickens

10 referred to?

11   MS. MILLER: I will get to that. Those

12 guidelines were received in April.

13   JUDGE MACE: April of '97?

14   MS. MILLER: April of '97. The guidelines

15 with regards to resale I think for the most part are

16 pretty thorough. There are still some gaps more down to

17 the detail. I think when we get into more complex we'll

18 have more questions on them. But the guides only say how

19 to fill out a manual form, and there for a while there was

20 no mapping of that manual form to the EDI system, and

21 those weren't provided to us until the end of April, so

22 we've had them for three weeks now. We've had to go from

23 a manual form to the EDI specifications.

24   So we've had to kind of do trial by error,

25 and as we say, coding by reject analysis. We were

MERRILL & ASSOCIATES, INC.

1   learning through our errors. A good example is this

2   Caller ID with Name. Ameritech's documentation gives

3   Caller ID with Name and gives the USOC, the code that you

4   need to use to order that, but never does it say you have

5   to order Caller ID along with Caller ID with Name to get

6   this feature, and it was only through rejects that we

7   learned that this was the case. And I heard Mr. Rogers or

8   Mr. Mickens say that that was fixed March of '97, that

9   they would accept an order with the Caller ID with Name

10   without Caller ID and they would process it, but I have a

11   reject of May 12th that says "We cannot accept this order

12   because you don't have Caller ID with it." So I don't

13   know if they fixed it for AT&T and not for MCI, but we're

14   still receiving rejects with that message.

15   I think the current operational processes

16   don't support a full entry. We have not used the

17   preordering specifications for CSRs, the due date

18   selection, or the phone number reservation, but in the

19   testing that I've read for Ameritech they've only shown

20   six concurrent users at one time on this system and

21   reported their response times of eight to 10 seconds, and

22   I have a systems background and I know that when you have

23   multiple users on a system, response time slows, and I've

24   not seen anywhere where they have more than six users on

25   the system trying to get customer service records or do

1   any of the preordering functions that I think it would be

2   more prudent to say if you have hundreds of users, which

3   is what would actually happen once people are up on

4   preordering, hitting the system at the same time and

5   seeing some kind of reasonable response date would be more

6   adequate as opposed to just six users on a system for our

7   double-billing issue, which we identified to Ameritech

8   early February, and told them that there is a double-

9   billing problem, through our testing we discovered this.

10   And up to date we have 16 examples of customers actually

11   being double-billed, of 194 orders. And that's only the

12   ones we know about.

13   Many of our orders are less than a few

14   weeks old, so we don't know whether this will be an issue.

15   Ameritech has sent us a letter stating

16   what they plan to do to resolve this issue, and MCI feels

17   it is not adequate; the process is highly manual with the

18   reps having to manually input information. And their

19   response does not address their ability for their retail

20   unit to market to our customers while this order is in an

21   error status and they still think the customer is theirs.

22   Their retail unit will call our customer up as if they

23   were an Ameritech customer and market to them. And we do

24   not get usage for that time.

25   I have a specific example where we

1   received a completion notice on February 20th, and the

2   billing system was not updated until May 22nd. Luckily

3   this was a test customer, but if this was a production

4   customer then those three months of usage, we would have

5   to back bill our customer for that. They would be

6   receiving bills from Ameritech, and it would only be

7   receiving a monthly bill from MCI without any usage, and

8   then we would have to go and back bill that customer for

9   that usage, or we would lose the revenue.

10   We also have examples of features that are

11   erroneously installed or not installed at all. And we

12   have noticed the erroneously-installed because we're

13   getting bills from them, and they say, "Oh, yeah, that

14   feature shouldn't have been there," or customers calling

15   in and saying "I don't have my Call Waiting" and it's on

16   the order and it never made it to the line.

17   MCI has also experienced a backlog of

18   orders. Seventy-eight of 474 order confirmations but no

19   completion or jeopardy, so these are the late 865s.

20   Twenty-five of the 474 orders we have no response from

21   Ameritech at all. We have sent the order and we have not

22   received a reject or a confirmation from them, and our

23   breakdown is from the week of April 27. We have one

24   pending completion notice.

25   From the week of May 5th we have eight

1   pending completion notifications. From the week of May

2   12th, 36 pending completion notifications and one pending

3   any kind of response, either the completion or the reject.

4   I mean the confirmation or the reject.

5   And from the week of 5/19 -- it's really

6   data from the 19th through the 21st -- there's 33 pending

7   completion notifications and 24 pending any type of

8   response from Ameritech.

9   So this isn't really even counting what

10   Ameritech addressed as late '65, with only 24 to 48 hours

11   late. That data has not been included in here.

12   COMMISSIONER SHEA: I'm not sure that I

13   understand this information now. You say on the week of

14   4/27 you have one pending complete notification?

15   MS. MILLER: Meaning we sent an order to

16   Ameritech, they responded with a confirmation with a due

17   date, and that's the last we heard of it.

18   COMMISSIONER SHEA: And how many did you

19   send that week?

20   MS. MILLER: I don't know the exact

21   number, but it was probably less than 100.

22   COMMISSIONER SHEA: How about the week of

23   the 5th?

24   MS. MILLER: How many total orders did we

25   send? Again these are just rough estimates. I'd have to

1   that we have, both in Michigan and the rest of the

2   Ameritech area.

3   JUDGE MACE: Thank you. Commissioners,

4   any questions?

5   COMMISSIONER SVANDA: You have been with

6   us through the morning. The tenor of your comments is

7   different from some other CLECs. Do you have an

8   explanation for that?

9   MR. PARRISH: Our business focus is a

10   little bit different. Our sales process is much more of a

11   close alignment with customers. We don't talk to a

12   customer on the telephone, we try to secure a CSR or other

13   information in a live environment. We actually go out and

14   meet the customer and then bring the information back and

15   go through the sales process.

16   So some of our sales processes have a

17   little bit of a driver into some of the differences that

18   you have seen.

19   The other issue is maybe that we're

20   working very closely from a systems perspective to

21   automate a lot of the things on our side of the process.

22   We do something that we call flipping an order, where we

23   take the USOC information that comes back from Ameritech,

24   mirror that and spit it back to them in an order, so that

25   automates a lot of the ordering process that maybe some of

ATTACHMENT B
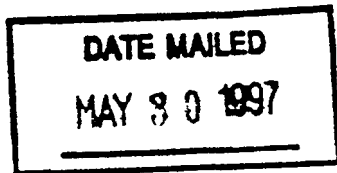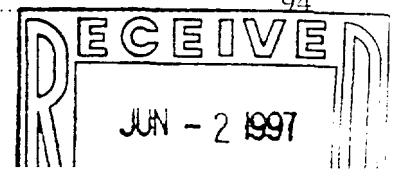
BEFORE THE

PUBLIC SERVICE COMMISSION OF WISCONSIN

Matters Relating to Satisfaction of
Conditions for Offering InterLATA Service   6720-TI-120
(Wisconsin Bell, Inc. d/b/a Ameritech
Wisconsin)

FINDINGS OF FACT, CONCLUSIONS OF LAW,
AND SECOND ORDER

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Docket 6720-TI-120

4.   Ameritech's offering must state that two-way trunking will be available upon request for local interconnection.

Ameritech's January 10, 1997, Statement included this offering, but it was not reflected in tariffs. Ameritech's filing of March 3, 1997, included this offering in tariffs.

5.   No adjustment is required on this issue in the first order..

6.   No adjustment is required on this issue in the first order.

7.   Ameritech's offering must be revised to make the implementation team an option available at the request of interconnecting companies.

Ameritech's January 10, 1997, Statement included this offering, but it was not reflected in tariffs. Ameritech's filing of March 3, 1997, included this change in tariffs.

ii. Nondiscriminatory Access to Unbundled Elements

1.   All terms and conditions of interconnection and unbundled elements must be included in tariffs.

Ameritech's March 3, 1997, Statement included all necessary terms and conditions in tariffs unless specifically identified as lacking herein.

Operations Support Systems

2.   All operations support systems and electronic interfaces must be tested and operational before they are acceptable for tariffing.

This issue was considered in the hearing held in this docket. Testimony was heard on March 31, 1997, and April 1, 1997. Oral argument was heard on April 2, 1997.

The Commission finds that Ameritech's Operations Support Systems (OSS) are not tested

and operational. The following is a summary of the legal requirements considered in making this

decision. In a review of a Statement filed under § 252(f)(1), a state commission may not approve

such a statement unless it complies with § 251 and the regulations thereunder. Under

§ 251(c)(3), local exchange carriers (LECs) are required to provide access to unbundled network

elements under rates, terms, and conditions that are just, reasonable and nondiscriminatory, and

an incumbent LEC must provide unbundled elements in a manner that allows requesting carriers

to combine such elements to provide such telecommunications service. In addition, per

§ 251(c)(4), incumbent LECs are required to offer for resale any telecommunications service and

may not impose on the offerings unreasonable or discriminatory conditions or limitations.

Regulations adopted pursuant to these sections of the Act include the FCC's interconnection

order, CC Docket No. 96-98 (Interconnection Order). The following are relevant quotes from the

rules promulgated by the Interconnection Order concerning OSS:

> **47 CFR § 51.313 Just and reasonable and nondiscriminatory terms and conditions for the provision of unbundled network elements.**
>
> (a) The terms and conditions pursuant to which an incumbent LEC provides access to unbundled network elements shall be offered equally to all requesting telecommunications carriers.
>
> (b) Where applicable, the terms and conditions pursuant to which an incumbent LEC offers to provide access to unbundled network elements, including but not limited to, the time within which the incumbent LEC provisions such access to unbundled network elements, shall, at a minimum, be not less favorable to the requesting carrier than the terms and conditions under which the incumbent LEC provides such elements to itself.
>
> (c) An incumbent LEC must provide a carrier purchasing access to unbundled network elements with the pre-ordering, ordering, provisioning, maintenance and repair, and billing functions of the incumbent LEC's operations support systems.

Docket 6720-TI-120

Examples of narrative supporting regulations regarding the provision of unbundled network elements on a nondiscriminatory basis are included in ¶¶516, 517, 518, 522, and 525 of the Interconnection Order. In establishing these regulations, the FCC determined that OSS are network elements and must be unbundled upon request and are subject to the nondiscriminatory access requirements. Specifically ¶518 states:

> Much of the information maintained by these systems is critical to the ability of other carriers to compete with incumbent LECs using unbundled network elements or resold services. Without access to review, *inter alia*, available telephone numbers, service interval information, and maintenance histories, competing carriers would operate at a significant disadvantage with respect to the incumbent. Other information, such as the facilities and services assigned to a particular customer, is necessary to a competing carrier's ability to provision and offer competing services to incumbent LEC's customers. Finally, if competing carriers are unable to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for network elements and resale services in substantially the same manner that an incumbent can for itself, competing carriers will be severely disadvantaged, if not precluded altogether, from fairly competing. Thus providing nondiscriminatory access to these support system functions, which include access to information such systems contain, is vital to creating opportunities for meaningful competition.

In addition, the FCC's Second Order on Reconsideration (of its Interconnection Order) concluded that to comply with its obligation to offer access to OSS functions, an incumbent LEC must, at a minimum, establish and make known to requesting carriers the interface design specifications that the incumbent LEC will use to provide access to OSS functions. The FCC concludes that information regarding interface design specifications is critical to enable competing carriers to modify their existing systems and procedures or develop new systems to use these interfaces to obtain access to the incumbent LEC's OSS functions. The FCC declined to condition the requirement to provide access to OSS functions upon the creation of national standards.

Accordingly, the Commission finds that to meet its stated "tested and operational" requirement, Ameritech must provide access to <u>each</u> of the following interfaces: pre-ordering, ordering, provisioning, repair and maintenance, and billing. That access must be nondiscriminatory, meaning in substantially the same time and manner that an incumbent LEC provides OSS functions to itself. Access to the necessary design and operating specifications must be provided to enable CLECs to use the interfaces. The burden of proof is upon Ameritech to show these requirements have been fulfilled. That burden of proof has not been met.

The evidence Ameritech presented at hearing regarding the "tested and operational" OSS requirement consisted of the statements of its employee, Joseph Rogers. Mr. Rogers testified that his conclusions that the systems were fully tested and operational were not based upon first-hand knowledge gained by personal review of the data, but upon statements of employees who worked under his direction. When presented with Ameritech's own trouble logs (Exhibits 4, 7, and 8), obtained through staff data requests, he had no personal knowledge regarding the contents of these reports. For troubles listed on those reports, he admitted he did not know whether the troubles had been corrected. Some of the listed troubles clearly affected the competitors' ability to provide service to their customers.

Troubles existed with the transaction set 865 and the firm order confirmation (FOC). The record identified that if FOCs are not properly issued, double billing errors could occur. In spite of the existence of such type errors, Mr. Roger's staff still advised him that the systems were fully tested and operational, and he relied on this information in preparing his testimony. Based on the evidence presented by Ameritech, the Commission could not conclude the systems were tested and operational.

Mr. Rogers identified that the interfaces were designed such that access would be provided to the OSS through the interfaces in a similar manner to that which is provided directly to Ameritech customer service representatives. However, evidence was lacking that in fact the interfaces perform in a manner similar to that provided to Ameritech customer service representatives. The AT&T order testing, which took place from October 7, 1996, to November 26, 1996, showed 67 percent of the completed transactions were processed manually. AT&T demonstrated that it had requested in writing information regarding all the causes of manual processing and had been denied that information by Ameritech. AT&T demonstrated it was only able to obtain such information through the regulatory process afforded by this proceeding.

Staff data requests and staff analysis demonstrated that manual intervention in orders resulted from causes on both the Ameritech and the CLEC sides of the interface. Staff analysis demonstrated that manual intervention was more likely than fully electronic processing to result in a missed due date. Staff analysis of error messages over time, showed new types of error messages on the Ameritech side of the interface were continuing to occur through the end of that analysis, February 26, 1997. The Commission concludes that, according to the data through February 26, 1997, the ordering interface was not providing predictable, reliable results. Therefore, the Commission concludes Ameritech's electronic ordering interface does not now provide ordering in substantially the same time and manner that it provides ordering to itself.

Also at issue was whether Ameritech would process transactions for competitors in substantially the same time and manner as those processed within Ameritech itself. An analysis of due dates met was presented, but it did not include a comparison measure for Ameritech's

own due dates met. In addition, Ameritech's measure of due dates met was inaccurate as it did

not consider overdue orders still pending as having missed due dates. An analysis of due dates

not met should include overdue pending orders as a due date not met.

Ameritech was not able to provide comparisons to Ameritech customer service

representatives for any of the pre-ordering functions. Significant differences in pre-ordering

processing time would be service affecting differences as end-user customers make their requests

for service by telephone and expect to receive telephone numbers and due dates while waiting on

the line. In addition, the lack of information on the interface for reporting repair or maintenance

leaves uncertainty regarding the quality of service provided to CLEC end-user customers

compared to that provided to Ameritech's own end-user customers.

The following additional deficiencies were identified through the hearing process.

Ameritech did not present evidence that the maintenance and repair interface would operate as

expected. In the case where no CLEC has chosen to process live transactions, simulated

transactions at significant volumes would need to be presented to demonstrate the interface is

operational. Such information was not presented. The specification information provided to

enable competing providers to use the ordering and billing interfaces was not complete for

unbundled network elements. Universal service ordering codes (USOCs) had not yet been

established for certain unbundled network elements or for combining unbundled network

elements. Without such USOCs, CLECs do not have all the necessary information to place

orders for unbundled network elements.

As the evidence in this docket, the federal legislation and the FCC orders make clear,

Ameritech's OSS systems are critical to a competitor's success. An inability to use those